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*Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SELENE OLIVIA CORONA VILLA, an  
 12 individual,

13 Plaintiff,  
 14 v.

15 LOYA INSURANCE COMPANY dba  
 16 FRED LOYA INSURANCE; DOES I-X, and  
 ROE CORPORATIONS I-X, inclusive,

17 Defendants.

18 **CASE NO. 2:25-CV-00378**

19 **STIPULATION AND [PROPOSED]**  
**ORDER TO EXTEND DISCOVERY**  
**DEADLINES**

20 **[FIRST REQUEST]**

21 The parties to this action, Plaintiff, SELENE OLIVIA CORONA VILLA (“Plaintiff”),  
 22 and Defendant, LOYA INSURANCE COMPANY dba FRED LOYA INSURANCE  
 (“Defendant”) and (collectively, the “Parties”), by their respective counsel, hereby stipulate and  
 request that the Court approve their request to extend the discovery deadline until November 3,  
 23 2025, pursuant to Local Rule IA 6-1 and Local Rule 26-3.

24 Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the first discovery  
 25 extension requested in this matter.

26 **DISCOVERY COMPLETED TO DATE**

27 • The parties conducted an FRCP 26(f) conference on May 28, 2025.

- The parties served and exchanged their respective FRCP 26(a) initial disclosures.
- Plaintiff served upon Defendant one set of Requests for Admissions, Interrogatories and Requests for Production of Documents on July 24, 2025. Defendant has not served their responses.

**DISCOVERY TO BE COMPLETED**

- PMK Deposition of Defendant.
- Plaintiff's Deposition.

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the requested extension. The parties have been working diligently to complete depositions.

The parties warrant and represent that this extension is in good faith and not for purposes of delay. As such, the parties are only requesting a sixty-day extension of the discovery deadlines.

## [PROPOSED] NEW DISCOVERY DEADLINES

## Initial Expert Disclosures

Currently: October 2, 2025

Proposed: November 1, 2025

## Rebuttal Expert Disclosures

Currently: October 30, 2025

Proposed: November 29, 2025

## Discovery Cut-Off Date

Currently: December 1, 2025

Proposed: December 31, 2025

## Dispositive Motion Deadline

Currently: December 31, 2025

Proposed: January 30, 2026

1 Joint Proposed Pre-Trial Order  
2

3 Currently: January 30, 2026  
4

5 Proposed: **March 1, 2026 or 30 days after resolution of dispositive motions**  
6  
7 per Local Rule 26-1(b)(5).  
8

9 If this extension is granted, all remaining discovery mentioned above should be concluded  
10 within the stipulated extended deadline. The parties aver that this request for extension of  
11 discovery deadlines is made by the parties in good faith and not for the purpose of delay.  
12

13 DATED this 19 day of September, 2025  
14

15 **MOSS BERG INJURY LAWYERS**

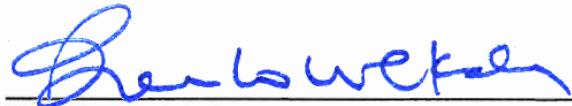
16 By:   
17 BOYD B. MOSS III, ESQ.  
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22 Las Vegas, Nevada 89146  
23 Attorneys for Plaintiff

24 DATED this 29th day of September 2025  
25

26 **RESNICK & LOUIS, P.C.**

27 By: /s/ Bradley Johnson  
28 M. BRADLEY JOHNSON, ESQ.  
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Las Vegas, Nevada 89123  
Attorneys for Defendant

29  
30 **IT IS SO ORDERED.**

31   
32  
33 **UNITED STATES MAGISTRATE JUDGE**

34 DATED: October 1, 2025  
35



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**RE: [External] Villa v. Loya**

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**From** Bradley Johnson <[bjohnson@sjwlawfirm.com](mailto:bjohnson@sjwlawfirm.com)>

**Date** Mon 9/29/2025 11:56 AM

**To** Candace Wiltsie <[candace@mossberglv.com](mailto:candace@mossberglv.com)>; Stephanie Jensen <[SJensen@sjwlawfirm.com](mailto:SJensen@sjwlawfirm.com)>

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Yes you may

## **M. Bradley Johnson, Esq.**

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**From:** Candace Wiltsie <[candace@mossberglv.com](mailto:candace@mossberglv.com)>

**Sent:** Monday, September 29, 2025 11:00 AM

**To:** Bradley Johnson <[bjohnson@sjwlawfirm.com](mailto:bjohnson@sjwlawfirm.com)>; Stephanie Jensen <[SJensen@sjwlawfirm.com](mailto:SJensen@sjwlawfirm.com)>

**Cc:** Boyd Moss <[Boyd@mossberglv.com](mailto:Boyd@mossberglv.com)>; Elise <[elise@mossberglv.com](mailto:elise@mossberglv.com)>; Drue Solomon <[Drue@mossberglv.com](mailto:Drue@mossberglv.com)>

**Subject:** Re: [External] Villa v. Loya

**Importance:** High

Good Morning Mr. Johnson,

I am following up on the proposed SAO to Extend Discovery Deadlines in the above referenced matter, as we have deadlines this week? May I affix your e-signature?

Regards,

*Candace Wiltsie, Paralegal*

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**From:** Candace Wiltsie <[candace@mossberglv.com](mailto:candace@mossberglv.com)>  
**Sent:** Friday, September 19, 2025 1:38 PM  
**To:** Bradley Johnson <[bjohnson@sjwlawfirm.com](mailto:bjohnson@sjwlawfirm.com)>; Stephanie Jensen <[SJensen@sjwlawfirm.com](mailto:SJensen@sjwlawfirm.com)>  
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**Subject:** Re: [External] Villa v. Loya

Good Afternoon Mr. Johnson,

Please find attached the proposed SAO to Extend Discovery Deadlines in the above referenced matter, Please advise if you would like to make any changes or if I can affix your e-signature.

Regards,

*Candace Wiltsie, Paralegal*

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